

# **Exhibit F**



Aaron Wright &lt;aaron@holcombward.com&gt;

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**Re: FOL v. ACLP et al. -- Discovery Letter**

1 message

**Aaron Wright** <aaron@holcombward.com>

Fri, Oct 4, 2024 at 12:01 AM

To: "Daniel J. Vedra" &lt;dan@vedralaw.com&gt;

Cc: Bryan Ward &lt;bryan.ward@holcombward.com&gt;, Paul Rachmuth &lt; paul@paresq.com&gt;, Holly Cole &lt;holly@holcombward.com&gt;

Dan,

I am writing in response to your email of this afternoon in which you wrote "Please send with references to the record and any discovery requests that these might be responsive to." I'm responding here to preserve the email chain.

With regard to the record, we do not yet have the transcripts to reference. However, with the end of fact discovery coming up on October 18, we wanted to move this issue forward quickly. Having been present at the depositions, if you have a different recollection, just let us know.

With regard to your request to identify which discovery requests these items might be responsive to, please see the following list. Please note that this list is not exclusive, and these items may be responsive to other discovery requests.

ACLP Defendants' First Request Item 2 covers September 27, 2024 Letter Items 2-5, 7-10, 15-22, and 27

ACLP Defendants' First Request Item 3 covers September 27, 2024 Letter Items 2 -5, 7, 22, and 27.

ACLP Defendants' First Request Item 4 covers September 27, 2024 Letter Items 2-7, 22, and 27.

ACLP Defendants' First Request Item 5 covers September 27, 2024 Letter Items 2-5, 7-9, 15-20, 22, and 27.

ACLP Defendants' First Request Item 6 covers September 27, 2024 Letter Items 2-5, 7-10, 18, and 22.

ACLP Defendants' First Request Item 7 covers September 27, 2024 Letter Items 2-5, 7-8, and 22.

ACLP Defendants' First Request Item 8 covers September 27, 2024 Letter Items 2-5, 7, 8, 11, 22, 24, 28, and 29.

ACLP Defendants' First Request Items 11- 14 cover September 27, 2024 Letter Items 2-5, 7-8, and 22.

ACLP Defendants' First Request Item 17 covers September 27, 2024 Letter Item 9.

ACLP Defendants' First Request Item 20 covers September 27, 2024 Letter Item 10.

ACLP Defendants' First Request Item 25 covers September 27, 2024 Letter Items 2-10, and 22.

ACLP Defendants' First Request Item 26 covers September 27, 2024 Letter Items 2-5, 7, 19, and 22.

ACLP Defendants' First Request Item 29 covers September 27, 2024 Letter Items 2-5, 7, and 22.

ACLP Defendants' First Request Item 35 covers September 27, 2024 Letter Items 2-5, 7, 11-14, 21-26, and 28-29.

ACLP Defendants' First Request Item 37 covers September 27, 2024 Letter Items 2-5, 7, 11-14, 22-25, and 29.

ACLP Defendants' Second Request Item 2 covers September 27, 2024 Letter Items 24-26.

ACLP Defendants' Second Request Items 4 and 5 cover September 27, 2024 Letter Items 2-5, 7, 14-20, and 22-25.

A review of our discovery requests shows that September 27, 2024 Letter Item 1 is not responsive to any request. Therefore, we withdraw our request that you produce it.

**Aaron Wright**

Holcomb + Ward, LLP

3455 Peachtree Road NE, Suite 500

Atlanta, Georgia 30326

404-601-2803 (Main)

919-265-9982 (Cell)

404-393-1554 (Fax)

\*\*Please note my old direct line is no longer in service\*\*

[Aaron@holcombward.com](mailto:Aaron@holcombward.com)

[www.holcombward.com](http://www.holcombward.com)

On Wed, Oct 2, 2024 at 5:12 PM Aaron Wright <[aaron@holcombward.com](mailto:aaron@holcombward.com)> wrote:

Dan,

Just following up on the below. Do you have a sense as to when you'll be able to respond?

Thank you,

**Aaron Wright**

Holcomb + Ward, LLP

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Atlanta, Georgia 30326

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404-393-1554 (Fax)

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On Mon, Sep 30, 2024 at 4:56 PM Daniel J. Vedra <[dan@vedralaw.com](mailto:dan@vedralaw.com)> wrote:

Aaron:

I have received the correspondence and note that I am busy responding to your motion for protective order.

Dan

1444 Blake Street

Holcomb + Ward, LLP / Re: FOL v. ACLP et al. -- Discovery Letter  
Denver, CO 80202

Office: (303) 937-6540

Direct: (720) 295-9391

Fax: (303) 937-6547

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**From:** Aaron Wright <[aaron@holcombward.com](mailto:aaron@holcombward.com)>

**Sent:** Monday, September 30, 2024 2:52 PM

**To:** Bryan Ward <[bryan.ward@holcombward.com](mailto:bryan.ward@holcombward.com)>

**Cc:** Daniel J. Vedra <[dan@vedralaw.com](mailto:dan@vedralaw.com)>; Paul Rachmuth <[paul@paresq.com](mailto:paul@paresq.com)>; Holly Cole <[holly@holcombward.com](mailto:holly@holcombward.com)>

**Subject:** Re: FOL v. ACLP et al. -- Discovery Letter

Dan,

Following up on the below. Would you please confirm that you've received the correspondence and let us know when we can expect a reply?

Thank you,

**Aaron Wright**  
Holcomb + Ward, LLP

3455 Peachtree Road NE, Suite 500  
Atlanta, Georgia 30326

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919-265-9982 (Cell)

404-393-1554 (Fax)

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[www.holcombward.com](http://www.holcombward.com)

On Fri, Sep 27, 2024 at 4:45 PM Bryan Ward <[bryan.ward@holcombward.com](mailto:bryan.ward@holcombward.com)> wrote:

Dan,

Please see the attached regarding discovery issues that have come up during Wednesday and Thursday's depositions. I'm happy to discuss next week if you have any issues or questions. Thanks.

Holcomb Ward, LLP/ReFOL v. EPA, et al., Recovery Letter

Have a good weekend, everyone.

**Bryan M. Ward**

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